

Revised July 2012

United States District Court for Western District of Tennessee  
**MOTION FOR LEAVE TO APPEAR PRO HAC VICE**

## Case Title

Plaintiff Cortez D. Brown, et al.	
Defendant Bill Oldham, et al.	
Case Number 2:17-cv-02015-JFT-dkv	Judge Honorable John T. Fowlkes, Jr.

I, Beth Bivans Petronio hereby apply to the United States District Court for the Western District of Tennessee, pursuant to Local Rule 83.4(d), for permission to appear and participate in the above-entitled action on behalf of Defendant Tyler Technologies, Inc. by whom I have been retained.

I am a member of good standing and eligible to practice before the following courts:

Title of Court	Date Admitted
See Exhibit A	

I certify that I subject myself to the jurisdiction of the United States District Court for the Western District of Tennessee and have obtained and have familiarized myself with and agree to be bound by the Western District of Tennessee Local Rules, Tennessee Supreme Court Rule 8 (Rules of Professional Conduct) and the Guidelines of Professional Courtesy and Conduct.

Please find attached a certificate of good standing from the highest Court of a state or the District of Columbia, and from a United States District Court.

A proposed order, in word processing format, granting this Motion will be emailed to the ECF mailbox of the presiding judge.

The pro hac vice admission fee is \$150.00 that shall be paid to the Clerk of Court through the Court's Electronic Case Filing System's pay.gov feature.

I hereby certify that the information provided below is true and accurate:

Applicant's Last Name <b>Petronio</b>	First Name <b>Beth</b>	Middle Name/Initial <b>Bivans</b>
Applicant's Firm Name <b>K&amp;L Gates LLP</b>		
Applicant's Address <b>1717 Main Street</b>		Room/Suite Number <b>Suite 2800</b>
City <b>Dallas</b>	State <b>TX</b>	Zip Code <b>75201</b>
Applicant's Email Address <b>beth.petronio@klgates.com</b>		
Applicant's Phone Number(s) <b>214.939.5815</b>		

#### Certificate of Service

I hereby certify that a true and correct copy of the foregoing pleading has been served via the Court's Electronic Case Filing system to the following:

Frank L. Wilson, Esq. Watson Burns, LLC 253 Adams Avenue Memphis, TN 38103  Lorna S. McClusky, Esq. Massey, McClusky, McClusky & Fusch 3074 East Road Memphis, TN 38128	Joseph S. Ozment, Esq. The Law Office of Joseph S. Ozment 1448 Madison Avenue Memphis, TN 38104  Robert E. Craddock, Jr., Esq. Robert L. Crawford, Esq. Odell Horton, Jr., Esq. Wyatt Tarrant & Combs-Memphis 1715 Aaron Brenner Drive, Suite 800 Memphis, TN 38120
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#### Certificate of Consultation

The undersigned hereby certifies that, pursuant to Local Rule 7.2, on February 7, 2017, I contacted counsel for Plaintiff, Frank L. Watson, III, who informed me that Plaintiff has no opposition to this motion.

s/ Bradley E. Trammell

Date <b>2/14/2017</b>	Electronic Signature of Applicant <b>S/ Beth Bivans Petronio</b>
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